

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SUSAN A. WOODS,)	CASE NO. 5:23-CV-1350
)	
<i>Plaintiff,</i>)	JUDGE DAN AARON POLSTER
)	
v.)	<u>INITIAL DISCLOSURES OF</u>
)	<u>CHILDREN'S HOSPITAL</u>
CHILDREN'S HOSPITAL MEDICAL)	<u>MEDICAL CENTER OF AKRON</u>
CENTER OF AKRON,)	
)	
<i>Defendant.</i>)	

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Children's Hospital Medical Center of Akron ("Akron Children's Hospital," or "Defendant") makes the following initial disclosures:

A. Individuals likely to have discoverable information that Defendant may use to support its defenses:

1. Rhonda Larimore, Chief Human Resources Officer, Akron Children's Hospital: Has knowledge of Defendant's policies, including its COVID-19 Related Employment Requirement Program policy, the process by which Defendant evaluated and made decisions concerning religious exemption requests, her communication with Plaintiff, and Plaintiff's religious exemption request(s) and Defendant's decision(s) concerning Plaintiff's request(s); may have knowledge of Plaintiff's employment and separation therefrom;
2. Members of Defendant's COVID-19 Exemption Review Team: Have knowledge of Defendant's COVID-19 Related Employment Requirement Program policy, the process by which Defendant evaluated and made decisions concerning religious exemption requests; may have knowledge of Plaintiff's religious exemption request(s) and Defendant's decision(s) concerning Plaintiff's request(s);
3. Kelly Gramata (nka Roman), Administrative Director, Medical and Surgical Subspecialties, may have knowledge of Plaintiff's employment and separation therefrom;
4. Members of Defendant's Human Resources Department: Have knowledge of Defendant's policies and procedures; may have knowledge of

Plaintiff's employment, religious exemption requests, and separation from employment;

5. Other persons with whom Plaintiff interacted during her employment;
6. Plaintiff's employer(s) subsequent to the employment described in the Complaint;
7. Persons identified in Plaintiff's Complaint and Initial Disclosures;
8. Additional persons listed in documents produced and/or obtained by the parties or their counsel; and
9. Other persons whose identities or significance with regard to the claims and defenses are unknown at this time.

Akron Children's Hospital personnel may be contacted through the undersigned counsel for Defendant. Defendant reserves the right to supplement this disclosure.

B. Description by Category of Documents that Defendant has in its possession or may seek, and may use to supports its defenses.

1. Plaintiff's personnel file;
2. Human Resources records related to Plaintiff;
3. Supervisor or departmental records related to Plaintiff;
4. Defendant's COVID-19 Related Employment Requirement Program policy and related documents;
5. Communication related to Defendant's COVID-19 Related Employment Requirement Program policy and its implementation;
6. Communication between Plaintiff and Defendant's employees related to Defendant's COVID-19 Related Employment Requirements Program policy;
7. Communication between Plaintiff and Defendant's employees regarding, and documents related to, Plaintiff's application for religious-based exemptions from Defendant's policies and requirements;
8. COVID-19-related Center for Medicare and Medicaid Services rules, regulations, guidelines, and related documents;

9. Documents relating to the EEOC Charge of Discrimination filed against Defendant by Plaintiff, as well as any other administrative charges or claims filed by Plaintiff;
10. Records reflecting actions taken by Plaintiff during her employment;
11. Relevant policies of Defendant;
12. Other documents related to the events alleged in the Complaint;
13. Documents relating to Plaintiff's current employment and compensation, including attempts to secure employment; and
14. Other documents, the relevance of which subsequently may become apparent.

Defendant reserves the right to supplement this disclosure.

C. Computation of Any Category of Damages Claimed by Defendant.

Not applicable.

D. Insurance Agreement.

Defendant maintains an employment practices liability insurance policy which can be made available for inspection and copying.

Respectfully submitted,

/s/ Jonathan M. Scandling
Andrew J. Cleves (0089680)
Jonathan M. Scandling (0093905)
FRANTZ WARD LLP
200 Public Square, Suite 3000
Cleveland, OH 44114
Telephone: 216-515-1660
Facsimile: 216-515-1650
acleves@frantzward.com
jscandling@frantzward.com

Attorneys for Defendant Akron Children's Hospital

CERTIFICATE OF SERVICE

The foregoing was served via electronic mail on Plaintiff on September 25, 2023:

Susan A. Woods
584 North Hawkins Avenue
Akron, Ohio 44313
Phone: 330-869-0815
Susanwoods@neo.rr.com

The forgoing was electronically filed with the Court on September 28, 2023.

/s/ Jonathan M. Scandling

One of the Attorneys for Defendant